

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE  
CENTRE GMBH and WEST PUBLISHING  
CORPORATION,

Plaintiffs/Counterdefendants,

v.

ROSS INTELLIGENCE INC.,

Defendants/Counterclaimant.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

C.A. No. 20-613-SB

**JURY TRIAL DEMANDED**

**PUBLIC VERSION**

**DECLARATION OF BARBRA FREDERIKSEN-CROSS IN SUPPORT OF  
DEFENDANT/COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S MOTION FOR  
SUMMARY JUDGMENT ON ITS AFFIRMATIVE DEFENSE OF FAIR USE**

OF COUNSEL:

Gabriel M. Ramsey  
Warrington Parker  
Joachim B. Steinberg  
Jacob Canter  
CROWELL & MORING LLP  
3 Embarcadero Center, 26th Floor  
San Francisco, CA 94111  
Tel: (415) 986-2800

Mark A. Klapow  
Crinesha B. Berry  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: (202) 624-2500

David E. Moore (#3983)  
Bindu A. Palapura (#5370)  
Hercules Plaza, 6th Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
dmoore@potteranderson.com  
bpalapura@potteranderson.com

*Attorneys for Defendant/Counterclaimant ROSS  
Intelligence, Inc.*

Dated: December 22, 2022  
10252217 / 20564.00001

Public Version Dated: January 5, 2023

**THIS DOCUMENT HAS BEEN  
REDACTED IN ITS ENTIRETY**